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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

21 RICHARD KADREY, *et al.*,
22 Individual and Representative Plaintiffs,
23
24 v.
25 META PLATFORMS, INC., a Delaware
corporation;
26
Defendant.

Case No. 3:23-cv-03417-VC-TSH

**DEFENDANT META PLATFORMS, INC.'S
RESPONSE TO COURT'S DISCOVERY ORDER
OF DECEMBER 4, 2024 | DKT. 305|**

Pursuant to the Magistrates Judge's Order on December 4, 2024 (Dkt. 305), Defendant Meta Platforms, Inc. ("Meta") hereby submits as the attached **Exhibit 1** an unredacted copy of Exhibit C (Dkt. 260-5) to Plaintiffs' Administrative Motion to Consider Whether Another Party's Material Should Be Sealed filed on November 8, 2024 (Dkt. 260).

Further, Meta hereby submits as the attached exhibits below revised copies of Exhibits D-F to Plaintiffs' Administrative Motion to Consider Whether Another Party's Material Should Be Sealed filed on November 8, 2024 (Dkt. 260) with narrowly tailored redactions:

- o **Exhibit 2:** a revised copy of Exhibit D (Dkt. 260-6)
- o **Exhibit 3:** a revised copy of Exhibit E (Dkt. 260-7)
- o **Exhibit 4:** a revised copy of Exhibit F (Dkt. 260-8)

Meta respectfully submits that good cause exists for the submission of the identified portions of these documents under seal for the reasons set forth in its earlier-filed Declaration of Michelle Woodhouse (Dkt. 282) in support of Plaintiffs' Administrative Motion to Consider Whether Another Party's Material Should Be Sealed filed on November 8, 2024 (Dkt. 260). Meta respectfully requests that the Court order sealed the redacted portions of revised Exhibits D-F.

[Signature page follows.]

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2 Dated: December 11, 2024

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